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ENVIRONMENTAL INC.
CHEMPRO Division

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SEP 27 1991

September 26, 1991

RCRA PERMITS SECTION

Ms. Carrie Sikorski
U.S. Environmental Protection Agency
RCRA Permits
Region X
1200 Sixth Avenue
Seattle, Washington 98101

Re: Chemical Processors, Inc. Pier 91 Facility - Response
to Questions

Dear Ms. Sikorski:

In a telephone conversation of September 11, 1991, Doug Brown of the Department of Ecology permits staff posed a question regarding the construction schedule for the Pier 91 Facility. Doug indicated that installation of Tanks 2709 and 2710 should be shown on the construction schedule, since these are identified as planned tanks in the Part B Permit Application.

These tanks are not intended to be installed as new tanks at the Pier 91 Facility. Instead, existing Tanks 113 and 114 will be upgraded to meet the required standards of WAC 173-303-640 in the event that these tanks are put into RCRA service as planned Tanks 2709 and 2710. Upgrading of planned Tanks 2709 and 2710 has been added to the Pier 91 construction schedule to indicate that this will occur as a discretionary project. I hope this clarifies the situation regarding these tanks.

In addition, Lynne Kilpatrick-Howard of the City of Seattle Fire Department made inquiries regarding the storage of ignitable liquids in tanks at the Pier 91 Facility. These inquiries have resulted in some minor revisions to three pages in the Part B Permit Application for the Pier 91 Facility.

Two copies of these pages are being supplied to Ecology with this letter, for copies 3 and 4 of the Pier 91 Part B Permit Application. Copies of the revised pages have also been sent to Ecology.

Please place these revised pages in Sections B and D of your copies of the permit application according to the enclosed

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revision instructions. Contact me at 223-0500 if you have any questions.

Sincerely,



Catherine L. Buller
Environmental Programs Manager

Enclosures

cc: Cindy Gilder, Ecology

LOCATION	DESCRIPTION	TYPE OF PROJECT (1)	ESTIMATED CONSTRUCTION DATES IN MONTHS (2)	
<u>EXISTING FACILITY</u>			<u>TIME</u>	<u>START - END</u>
Loading/unloading area; temporary container storage area	Construction of pad	Part B Plans	7	0 - 7
Northwest quarter of small yard	Secondary containment upgrade, remove tanks 106 and 108	Discretionary	3	2 - 5
Northwest quarter of small yard	Replace tanks 106 and 108 with tanks 2702 and 2704	Discretionary	8	6 - 14
Southwest quarter of small yard	Secondary containment upgrade around tanks 2701 and 2703	Discretionary	3	4 - 7
Southwest quarter of small yard	Upgrade tank bottoms on tanks 2701 and 2703	Discretionary	3	11 - 14
Southeast area of small yard	Upgrade tank 2709 ⁽³⁾	Discretionary	2	12 - 14
Southeast area of small yard	Upgrade secondary containment (except around tank 2710)	Discretionary	3	15 - 18
Southeast area of small yard	Replace tank 115 with tank 2307	Discretionary	18	18 - 36
Southeast area of small yard	Replace tank 116 with tank 2308	Discretionary	8	37 - 45
Southeast area of small yard	Replace tank 117 with tank 2309	Discretionary	8	46 - 54

LOCATION	DESCRIPTION	TYPE OF PROJECT (1)	ESTIMATED CONSTRUCTION DATES IN MONTHS (2)	
			<u>TIME</u>	<u>START - END</u>
Southeast area of small yard	Replace tank 118 with tank 2310	Discretionary	8	55 - 63
Southeast area of small yard	Upgrade secondary containment around tank 2710	Discretionary	?	48 - ??
Southeast area of small yard	Upgrade tank 2710 ⁽³⁾	Discretionary	?	60 - ??
<hr/>				
<u>PROPOSED FACILITY</u>				
	Construct secondary containment, install tanks	Discretionary	?	Begin in 5th - 6th year

(1) The types of projects identified in this column are defined below.

Part B Plans - Planned actions, pursuant to Part B Permit application.

Compliance Standard - Actions required to upgrade the facility from interim status regulatory requirements to final status (Part B) regulatory requirements.

Discretionary - Actions (i.e. layout changes) identified as changes in the facility Part B Permit, not related to regulatory requirements or compliance, but planned for completion within the life of the Part B Permit. Should Chempro choose to implement these projects, all applicable regulatory requirements will be met.

(2) The dates identified in this column provide a range of estimated construction start dates for each project. Due to operational constraints and the availability of subcontractors, estimated construction start dates may be subject to change. If the construction schedule shown here changes after Part B Permit issuance, a permit modification will be submitted for agency and public review.

(3) These are existing tanks (tanks 113 and 114) that are not currently in RCRA service. Upgrades will be made in the event that the tanks are put into RCRA service as tanks 2709 and 2710.